

Cool Company Privacy Policy - Umbrella Employee

Content

- | | |
|---|--|
| 1. INTEGRITY POLICY AND PROCESSING OF PERSONAL DATA | 7. INCREASED PROTECTION FOR YOUR PERSONAL DATA |
| 2. COLLECTION OF PERSONAL DATA | 8. YOUR RIGHTS AND HOW YOU UTILIZE THEM |
| 3. LEGAL BASIS FOR COLLECTION AND PROCESSING | 9. LIMITATION OF THE RIGHTS OF THE REGISTRANTS |
| 4. TIME PERIOD | 10. CORRECTION OF PERSONAL DATA |
| 5. RECIPIENTS AND SUPPLIERS | 11. UNDER AGE |
| 6. TRANSFER TO A THIRD PARTY COUNTRY | 12. CONTACT WITH DATA PROTECTION OFFICER |
| | 13. ARCHIVING OF CONSENT |

1. Integrity policy and processing of personal data temporary worker

Cool Company values your personal data and we welcome the new law (GDPR) that will be in force from the end of May 2018. The new law is intended to strengthen your integrity protection. In this policy, we describe how we process your personal data. If you have questions, you may be able to find an answer to them in this text, or you can send a question to dataskyddsbud@coolcompany.se or call our customer service.

Personal data controller Cool Company Skandinavien AB Org. no. 556432-8390, Riddargatan 7A 114 35 Stockholm, Tel: 010-330 30 11 E-mail: fakturera@coolcompany.com

2. Collection of personal data

We must collect your personal data to be able to employ our Temporary Worker's. In order for Cool Company to be able to process personal data, we must have a legal ground, that is, a legal basis. Processing of personal data is legal, if the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Processing is also legal if the processing is necessary for compliance with a legal obligation to which Cool Company is subject. Processing may also be done according to a balancing of interests, where Cool Company's interest in processing information is balanced against the interest of the registrant in protection of integrity and the result is that a legitimate interest exist, or after the registrant has submitted consent to the processing. Consent is submitted separately and can always be revoked. If you don't want Cool Company to process your personal data at all, you should not create an account or become one of our employees.

3. 3. Legal basis for collection and processing

Fulfilment of agreement:

Since we are an employer for our Temporary Workers, this requires that we can process personal data to be able to enter into or fulfil agreements. The purpose is to administer employment conditions, which can involve payment of wages or to contact the employee. To fulfil our part of the

agreement as an employer may require, in certain cases, that Cool Company gives out information about the employee to our client, that is to say the person commissioning the assignment. When you are employed by Cool Company, by law it is required that we can continually inform you about issues that affect your position, that can relate to the working environment.

If and when we need to get credit information to be able to provide our service Express-pay, it is both to fulfil the agreement and in our legitimate interest that we process your personal data for this purpose. If you don't want us to do a credit check you should not select the Express pay service.

Legal obligation:

Cool Company processes personal data because of the liabilities that arise through law or other statutes, regulations of authorities, decisions, requests or guidelines. Personal data and the documents that are required in the Accounting Act is stored for as long as required. Documentation for bookkeeping and accounting may consist of agreements, written correspondence and invoices. Processing of personal data is required since we for example must submit personal data to the UK Tax Agency and other authorities and national organisations.

Fulfilment of agreement/legitimate interests:

Cool Company processes personal data by analysing and processing statistics. For this processing, we can use both encrypted and pseudonymised data. The aim with this processing is so that we are able to improve our business and continue to offer our employees and customers good service, functionality and services.

Cool Company uses cookies on our websites to be able to offer a better ease of use for our visitors. We can perform certain tests on our home page that give us statistics on how a certain function on our page is user-friendly or not. A cookie is a text file that is saved on your device so that our website can recognise your device. If you want to know when your device receives a cookie, you can set your web browser so that it notifies you about this. In such a way you have a possibility to accept or reject a cookie. If you only visit our open site, we cannot see any personal data in our cookies but this offers only statistics and anonymous information such as your way into our site. Cool Company may use systems such as Google Adwords, Google Analytics, Facebook, Bing etc. in order to create target groups in advertising platforms.

Cool Company believes that there is a legitimate interest in maintaining security in our services, but that this is also a requirement for our being able to fulfil our part of the agreement. We do this processing to be able to offer you as safe and good a home page as possible.

Cool Company processes your personal data by handling case history to be able to offer you customer service and to continually train our partners and improve our work methods to be able to offer the best possible support. When you contact us, the communication can be a reason for analysis. We expect that to be able to fulfil our part of the agreement, we should be able to offer good customer support, which is one of the services we are paid for. Our customer support is one of our primary means of communication with our employees. For non-employee, we believe that it is in our and your legitimate interest so that we can offer good customer support, but also so that we can enter into an agreement with you.

Basic significance for those registered:

Cool Company can process personal data such as the nearest dependent to you as an employee when we believe that it may be necessary to protect interests that are of basic significance for you as an employee. It is still your choice about how you want to provide us with this information.

Legitimate interests:

Cool Company can turn to you with direct marketing which is a legitimate interest since we will inform you about existing or new services. We market both our existing and new services which can be for the purpose to enable more work opportunities for you or to facilitate your daily activities when you are employed by us. Cool Company actively works to be able to offer clients and our temporary workers the best possible ease of use, and to develop new products that can facilitate the day to day for our clients and temporary workers. Cool Company can use your personal data that we have stored and certain user data for this purpose. The legitimate interest for this processing is to optimize our services and processes to provide the best services for our clients and our temporary workers over the long term. You always have the possibility to request that we do not send marketing information to you.

Consent:

To enable for you to obtain information interesting just for you, we would like to use your personal data for profiling. For this we need your consent. Profiling means that we process personal data by collecting, saving, processing and analysing data to bring out offers that match you and your needs. From your profile you get information about services and products that may be of interest for you, or that facilitate your work role and your relation to us in some way. You must be at least 18 years of old to provide consent. You do not need to provide consent to use the service and/or become a temporary worker. You can also revoke consent after the fact under your account settings

4. Time period

Cool Company store and processes personal data as needed for those who performed assignments as temporary worker's in accordance with law and this is deleted before ten years from the time the last wages were paid from us. The categories that are saved are those that are needed for legitimate aims.

For registered users who never perform assignments as temporary worker's, whose accounts has been inactive for three years, Cool Company automatically will delete with their accounts. The account will be deleted three years from the registration if you do not actively elect to save your account. An account is considered to be inactive if the registered account holder has never been employed by us and has not logged in to their account for three years, and not opened an email from us for more than a year.

Personal data that has come in to customer support is deleted after one year, if the information is not needed for longer because of an identified objective or legal reasons.

If you delete your account yourself, your information is deleted quickly, within a month from the time you deleted the account assuming that the information is not needed for legal reasons.

If you want your information to be removed, we will do this within a month from when you submitted the request assuming that we don't have to save the information because of our legal obligations.

5. Recipients and suppliers

Cool company share your personal data with different recipients. It can be different suppliers of IT systems, , case management systems or that personal data is shared with our bank, where the bank processes this for payment of wages.

Cool Company also provides your personal data to other recipients such as authorities, if we are obligated to provide your personal data according to law or a decision by an authority.

In most cases, our clients, meaning the person providing the assignment, need access and processes your personal information. Most often clients themselves collect necessary personal data directly from you but sometimes your personal data is collected by the client through Cool Company.

The legal basis for us to share your personal data to our client is to fulfill or enter into an employment agreement which you are or intend to be party to. Cool Company has when required by law an agreement with the recipient of personal data.

Cool Company has a page on Facebook and an Instagram account where we communicate with the visitors who choose to comment. It is optional to comment, follow and communicate with us at these social medias. We use these forums to spread information about us, inform about news and it is also a part of our customer support.

The Personal Data collected on our Facebook page and our Instagram account is the visitor's username if the visitor publish a comment (username constitute Personal Data if it consists of their name) and if the comment itself contains Personal Data this is of course also collected. However, we must strictly advise our visitors to not include any Personal Data in comments on these forums. We refer questions of a personal character to our regular customer support.

Facebook and Instagram store and process the Personal Data provided at these forums in accordance with their privacy policy. If you visit these social medias the suppliers also can collect Personal Data for their own use (through cookies). If you want to read more about what these suppliers collect, we refer to their privacy policy and the information they offer on their websites. For more information about cookies, please read our separate clause about cookies, which also inform about the fact that you can configurate your browser if you don't want to receive cookies.

6. Transfer to a third party country

Recipients and suppliers can be established both within the EU/EEA and in a third party country. A third party country does not apply the legislation GDPR. If Cool Company transfers your personal data to a third party country, we check that there is either an adequate level of protection in the country or that there are special guarantees that the information and your rights are protected. Sufficient guarantees can be that the transfer is regulated by special contract clauses that protect your rights or by internal company rules that are passed through. The contract clauses that are mentioned have a content that aims to ensure that the contractor shall live up to the standard that the GDPR requires and ensure that your integrity is protected.

You can find the countries that the EU-commission has decided have an adequate level of protection here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfersoutside-eu/adequacy-protection-personal-data-noneu-countries_en

The standard contract clauses that the EU-commission approved and that we use may be found on:

7. Increased protection for your personal data

Cool Company undertakes so called appropriate technical and organisational steps to increase the protection for your personal data. Examples can be:

- encryption,
- policy's,
- routines,
- internal register of personal data,
- assessment of consequences,
- information minimisation,
- restricting access to personal data within the company.

We value the access to your personal data and do not let unauthorised persons gain access to this. (Cool Company has confidential agreements with consultants who work for the company).

8. Your rights and how you utilize them

According to the law you have certain rights you can make use of. In most cases you can use your rights without any cost. We will answer a request from you without unnecessary delay, most often this occurs within a month.

Your rights mean that you can,

- get a verification of whether we process your personal data (and if so your personal data is processed in accordance with what is mentioned here),
- get a copy of the personal data that we process,
- object to processing or request so called data portability,
- limit processing of your personal data,
- have your personal data corrected,
- have your personal data deleted, or
- request a revocation of consent (this does not affect the legality of processing on the basis of consent before this was recalled).

To revoke consent regarding profiling you can unclick the box you checked when you submitted consent. You can find the box at the following link:

<https://app.coolcompany.com/dashboard/settings>(requires that you log in). If you want to utilise any of your other rights, you can send in an email to dataskyddsbud@coolcompany.se

You always have the right to complain to the regulating authority if you are of the opinion that our processing of your personal data is incorrect.

9. Limitation of the rights of the registrants

If you performed an assignment as a temporary worker with us, all of your rights are limited to only being performed to the extent that they do not constrain Cool Company's ability to fulfil their legal obligations, or to only be performed if the information isn't needed for other legal purposes. (This means that if you have requested actions such as, for example, erasure, Cool Company must still save the personal data that is considered necessary as long as applicable law or a legal ground requires. If not all registered information is considered necessary, Cool Company can still perform the desired action for the personal data that is not needed).

10. Correction of personal data

If you change your name, address or contact information, or noticeable incorrect information, it is your responsibility to change your information in the account so that this is updated and correct. Cool Company always wants to have correct information about you and will do what we can so that your information is updated. If your personal data is subject to correction or deletion, Cool Company will notify the recipients of your personal data, provided that Cool Company finds it possible and not unreasonably burdensome.

11. Under age

For under age temporary workers we have a special integrity policy that is especially adapted and that describes the processing we do according to personal data for registered under 18 years.

12. Contact with a data protection officer

If you need to contact our data protection representative, you can always call customer support or send an email to dataskyddsbud@coolcompany.se.

13. Archiving of consent

Since Cool Company has the burden of proof that any consent has been collected and stored.